

**To:** Mara Alexander[malexander@blm.gov]; Timothy Fisher[tjfisher@blm.gov]; Sally Butts[sbutts@blm.gov]; Nikki Moore[nmoore@blm.gov]  
**From:** Wootton, Rachel  
**Sent:** 2017-07-20T18:22:05-04:00  
**Importance:** Normal  
**Subject:** Re: Comments on NM analyses  
**Received:** 2017-07-20T18:22:37-04:00

Hi Mara, Tim, Sally, and Nikki,  
We got an add in to the comments on a few reports. I wanted to give you a heads up. We will need to add it in (I think the comments are very helpful)! Please see the comments below.

Best,

Rachel

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----- Forwarded message -----

**From:** Wootton, Rachel <[rwootton@blm.gov](mailto:rwootton@blm.gov)>  
**Date:** Thu, Jul 20, 2017 at 6:20 PM  
**Subject:** Re: Comments on NM analyses  
**To:** Julie Suhr Pierce <[jsuhrpierce@blm.gov](mailto:jsuhrpierce@blm.gov)>  
**Cc:** Abbie Jossie <[ajossie@blm.gov](mailto:ajossie@blm.gov)>, Allison Ginn <[aginn@blm.gov](mailto:aginn@blm.gov)>

Hi Julie,  
Thank you so much for providing your comments! I'll along to include in the combined document we send back to DOI. We really appreciate your review, and I hope you have a great evening!

Best,

Rachel

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On Thu, Jul 20, 2017 at 6:14 PM, Julie Suhr Pierce <[jsuhrpierce@blm.gov](mailto:jsuhrpierce@blm.gov)> wrote:

Rachel,

I was given the opportunity to review eight National Monument economic values and economic contributions reports. I have some text-related comments and a few general comments.

On the following three reports, I have no specific comments:

Canyons of the Ancients  
Carizzo Plain  
Grand Canyon-Parashant  
Ironwood

Specific comments:

Grand Staircase-Escalante

A remarkable amount of money, effort, and legislation has gone toward compensating those who had financial interests that were affected by the Monument designation. I think the report does a good job of bringing those to the reader's awareness.

Vermillion Cliffs

Table 1 needs to be reformatted.

Sonoran Desert

It might be helpful to add to the paragraph on the target shooting issue (page 5) a brief note that wildfire danger is increased by allowing target shooting. The paragraph mentions that target shooting is controversial but doesn't indicate why.

Mohave Trails

Typo on page 6, paragraph on grazing: "Since 2010, the number of AUMs billed increased from 1,20 in FY 2010..."

General comments:

In some of the reports, a statement is made that insufficient information was provided to be able to do an adequate analysis of natural resource trade-offs. I spoke about this with BLM economist Josh Sidon, who worked on some of the reports. He told me that when he requested minerals potential data, he was told that because of the withdrawal at the time of Monument designation, locatables were not an issue by definition (due to having been withdrawn from mineral entry). But that is a circular argument; it would be important to know for the purposes of this exercise, absent withdrawal, what mineral deposits would have been expected to have a moderate or high probability of being technically and economically extractable.

I have no further comments.

I appreciate having the opportunity to provide feedback.

Best regards,  
Julie Suhr Pierce

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